

Responses to May 17, 2019 USEPA and EGLE Comments
Area 1 Pre-Design Investigation Work Plan Addendum 3 – Remedial Reach Sediment Sampling

Commenting Organization: EPA

General Comment #1

For two of the three hotspots (KPT-19 and KRT-5) the work plan indicates that the approach is to only sample the nearest two or three transects adjacent to the hotspots. The other, more outer transects will be analyzed only if the inner transects are high. Although this approach is appropriate, there is no real decision rule. The work plan needs to include a decision rule for determining when the out transects will be sampled.

An example decision rule might be “any PCB above detection or above 1 mg/kg will result in the outer transects being sampled.”

Response: As discussed in work group meetings, there is no specific number associated with identifying a hotspot. To decide whether or not to analyze the next outer transect, or a portion thereof, will be based on evaluating sample concentration trends, isolated areas of higher/lower concentrations, and/or clusters of higher/lower concentrations. Wood will review and evaluate the data looking for concentration trends that indicate delineation is achieved. We will provide the USEPA with our evaluation and recommendations to proceed (or not) to the next transect or portion thereof, and have the corresponding samples analyzed with concurrence from the EPA.

Commenting Organization: EGLE/EPA

General Comment #2

The Work Plan describes that Bedform Groups 3-02, 3-15 and 3-18 may be extensions of known hotspots KPT-19, KRT-4, and KRT-5/FF-19 and borders of “known hot spots” and bedform polygons may be redrawn based on sample results. Any adjustments made to polygons (hotspots, bedforms, etc.) or SWAC calculations that were previously agreed upon by the Agencies must be presented for discussion prior to implementing proposed changes.

Response:

Agreed. It will be a deliberative process with work group collaboration to adjust the polygons and hotspot areas as needed to support development of removal areas.

Commenting Organization: EGLE

General Comment #3

In some instances, sample locations are proposed upstream and downstream of previous sample locations that are above the sediment remedial goal (e.g. Bedform Group 3-15 and 3-13) and in other instances locations are only proposed upstream of previous sample locations that exceed the sediment remedial goal (e.g. Bedform Group 3-18). The document would benefit from the insertion of a minor

discussion on how delineation points were placed and what concentration thresholds or criteria were used when determining the placement of sample locations.

Response:

The primary goal of sampling is to find the extent of the hotspot areas. Sample transects (grids) presented in the work plan were extensions of the transects/grids used in the two previous hotspot investigations consistent with previous spacing. For example, using transects downstream of KRT-5/FF-19 will allow us to see if there is a trend going toward polygon 3-18 and evaluate whether or not it is a part of the hotspot or a separate feature. For the two bedforms that were not part of the expanded hotspot investigation, a grid with random origin was placed over it to gain additional data for characterization and updating SWAC estimates.

Clarifying text has been added to sections 3.1.1, 3.1.2 and 3.2.

Commenting Organization: EPA/EGLE

Section: 2.1.3 AND 2.2.3 Page #: 2-2 and 2-3

Specific Comment #1

Under Establish Action Levels – this sentence should be rewritten “...(SWAC) to the Final Remediation Level of 0.33 mg/kg in the sections of Area 1 over time.”

Response:

Acknowledge. Text revised per above, but changing “level” to “goal” to match UAO language (i.e., FRG).

Commenting Organization: EGLE

Section: Figures 3-1, 3-2, 3-3

Specific Comment #2

As shown in Figures 3-1 through 3-3, a portion of the transects have proposed sample locations that appear to re-occupy or are proximal to 2017/2018 sediment sample locations (e.g. T210, T203, T202, T205, T206, unnamed locations downstream of bedform Group 3-13, etc.). The document should explain the purpose and benefit of collecting samples proximal to ones collected in 2017 and/or 2018.

Response:

Hotspot delineation transect/core locations are based on a systematic grid spacing of points using a random origin. Placement of additional hotspot delineation core locations was performed by extending the previous grids/spacing, and new locations were retained when they were proximal to previously placed cores in the adjacent polygons. In addition, the new cores placed to delineate the hotspot areas will extend to refusal whereas the prior polygon cores were advanced to four feet; therefore, the additional investigation of hotspot delineation cores will provide data at deeper intervals than the polygon cores. Clarifying text has been added to Section 3.2.